



# TRAPPER MINING INC.

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July 29, 2020

Ms. Erin Scott  
Water Quality Protection Section - Industrial Compliance Program  
Water Quality Control Division  
Colorado Department of Public Health and Environment  
WQCD - WQP - B2  
4300 Cherry Creek Dr, South  
Denver, CO 80246-1530

Dear Ms. Scott,

**Subject: CDPS Permit No. CO-0032115, Renewal Permit Issues Clarification**

Trapper would like to thank the Division for the careful consideration they took on several of our comments as presented for the draft permit for Trapper Mine. The final permit has been presented in a much cleaner and easily understood format than the draft. After reviewing the final permit, there are a few items we would like to clarify and or correct before the permit takes effect.

In permit Part 1.B.2. This statement is somewhat confusing in regard to the suggestion that only precipitation events are allowed to be discharged through these outfalls. I understand this statement pertains to the “intermittent” status of these outfalls for WET Testing purposes. However, the three outfalls listed are the ones to be used for Mine Water. This statement is confusing and should be revised to include the discharges from pit pumping on an “intermittent” basis or otherwise rephrased so as not to appear to exclude process water.

Permit Part 1.C.5.a. This section requires that a drainage study be conducted upon the first discharge of outfall 025. It further states this study is due by 4/1/21. This outfall is not expected to discharge any time in the near future, and most likely will never discharge. We are unsure of how to meet this requirement if no discharges occur. Will a report stating no discharges have occurred suffice to fulfill this report date, with the understanding that if a discharge is to occur after this date that Trapper will conduct a study at that time? If “Mine Water” was removed, via a modification, as a waste stream to this outfall and it became “Stormwater Only” would the flow study still be required?

Permit Part 1.I.2.h.ii.c. This section refers to a general SWMP requirement of documenting deviations from sampling within the first 30 minutes of a measurable storm event. I believe this statement to be in error, as it appears this permit gives the permittee the ability to sample stormwater discharges as needed per the required sampling intervals established in Part I.C.1. If this is not the case, this statement and the required monitoring requirements of I.C.1 would be contradictory. Every effort is made to capture and sample relevant discharges from the site, but the ability to sample any or all sites within 30 minutes of an event would be impossible at this facility due to access, distance, area and ground conditions. Please clarify the intent of this section.

Some additional comments on statements noted in the Fact Sheet follow:

In section VII.A.4.d it is noted that a TDS load evaluation could not be calculated as Trapper had not reported TDS. This statement is incorrect. TDS was collected and reported on a quarterly basis as required by the prior permit. The ability to enter this information was not provided via the Net-DMR reporting process. Despite direct requests from Trapper and repeated comments on the quarterly cover letter, provided with the DMR data, to revise the input fields, the form was never revised. TDS values were included and shown on the attached cover letter each quarter for applicable outfalls. This letter, consequently, also contained the burden of proof documentation for the alternate

limits which was also often times overlooked. Trapper only requests that it is understood we did comply with this permit requirement. This statement was overlooked in our comments on the draft permit.

Section X.A, Construction activities at coal mining facilities; Trapper would like further clarification on this item. We are unsure of the exact nature of an activity that would classify it as a construction activity versus our normal mining operations. This also states co-mingled effluent would be subject to process water limitations, but the effluent limits for the stormwater on the site are more stringent than the construction stormwater limits. It is confusing to require an additional permit for construction activities that may come along with stormwater effluent from the site. The only instances that this requirement may be needed is if an existing stormwater impoundment were not downstream of a construction activity. It would seem any activity within our stormwater management area would be covered by the broader individual permit.

Please contact me with any further questions, 970-826-6143, or [graham.roberts@trappermine.com](mailto:graham.roberts@trappermine.com).

Sincerely,



Graham Roberts  
Environmental Engineer

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